

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

PNC Bank, National Association, successor in  
interest via merger to National City Bank, successor  
in interest via merger to Mid America Bank, FSB,

Plaintiff,

v.

Carmar D. Wooten-Burroughs Trustee of Trust  
Agreement dated January 1, 1991, and known as The  
Carmar D. Wooten-Burroughs Trust No. 1; Carmar  
D. Wooten-Burroughs; City of Chicago,

Defendants.

Case No. 12 cv 433

Assigned Judge: Matthew F. Kennelly

Magistrate Judge: Sidney I. Schenkier

**MOTION FOR JUDGMENT OF FORECLOSURE AND SALE**

NOW COMES the Plaintiff, PNC Bank, National Association, successor in interest via merger to National City Bank, successor in interest via merger to Mid America Bank, FSB, by its attorneys Crowley & Lamb, P.C., and moves the Court for the entry of a Judgment of Foreclosure and Sale in its favor and against the Defendant(s):

1. City of Chicago

and as grounds thereof state:

As appears from the Affidavit of Plaintiff placed on file in support of this Motion attached hereto as Exhibit "A", and from the pleadings and admissions on file, there is no genuine issue as to any material fact, and the Plaintiff is entitled to a Judgment of Foreclosure and Sale in this case as a matter of law.

PNC Bank, National Association, successor in interest  
via merger to National City Bank, successor in interest  
via merger to Mid America Bank, FSB

By: /s/ Francis J. Pendergast, III  
One of Its Attorneys

Patrick D. Lamb (ARDC #3128062)  
Francis J. Pendergast, III (ARDC#3127593)  
CROWLEY & LAMB, P.C.  
221 N. LaSalle Street, Suite 1550  
Chicago, Illinois 60601  
(312) 670-6900  
[plamb@crowleylamb.com](mailto:plamb@crowleylamb.com)  
[fpendergast@crowleylamb.com](mailto:fpendergast@crowleylamb.com)